

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

**SOUTHWEST MARINE AND GENERAL
INSURANCE COMPANY, as subrogee of
MembersAlliance Credit Union,**

Plaintiff

V.

AMONE AMANDA CHANTHALALAY,

Defendant.

Civil Action No. 3:24-cv-50003

MOTION FOR ENTRY OF CONSENT JUDGMENT

Plaintiff, Southwest Marine & General Insurance Company (“Southwest Marine”), by and through its attorneys, McElroy, Deutsch, Mulvaney & Carpenter, LLP, and with the consent of Defendant, Amone Amanda Chanthlalay (“Ms. Chathalalay”), moves for the entry of a consent judgment in favor of Southwest Marine and against Ms. Chathalalay, and in support thereof avers the following:

1. On January 3, 2024, Southwest Marine filed a Complaint against Ms. Chathalalay alleging claims for fraud, conversion and unjust enrichment See Docket Entry No. 1.
2. Ms. Chathalalay failed to plead or otherwise defend as required by the Federal Rules of Civil Procedure, and on February 16, 2024, the Clerk entered default against Ms. Chathalalay. See Docket Entry No. 9.
3. Ms. Chathalalay thereafter retained George Hampilos, Esquire to represent her in this matter and Mr. Hampilos entered his appearance on behalf of Ms. Chathalalay. See Docket Entry No. 15.
4. The parties thereafter negotiated a settlement whereby Ms. Chathalalay agreed to

the entry of a Consent Judgment in favor of Southwest Marine and against Ms. Chathalalay in the amount of \$70,000.00.

5. The parties agree that Ms. Chathalalay denies all claims against her but also agree to the entry of a Consent Judgment to avoid the uncertainty and additional costs of litigation.

WHEREFORE, Plaintiff, Southwest Marine & General Insurance Company, with the consent of Defendant, Amone Amanda Chanthalalay, respectfully requests that this Court enter the Consent Judgment attached hereto.

**McELROY, DEUTSCH, MULVANEY &
CARPENTER, LLP**

Dated: April 5, 2024

By: /s/ Matthew A. Lipman
Matthew A. Lipman, Esq.
1617 JFK Boulevard, Suite 1500
Philadelphia, Pennsylvania 19103-1815
Telephone: (215) 557-2900
Facsimile: (215) 557-2990
mlipman@mdmc-law.com

*Attorneys for Plaintiff, Southwest Marine &
General Insurance Company*